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28 SEP 1958

Mr. Lawrence R. Houston  
General Counsel

Dear Larry:

You may have heard that we are trying a new experiment this year in the Junior Officer Training Program. Instead of having JOT's enter the Agency throughout the year we are attempting to enter a 1960 Class of JOT's this September who will receive all their formal basic training as a group and then be turned over to the various component offices for the on-the-job training phase of the program. This plan will help us solve the problem of what to do with JOT's between courses, enable us to gear the training content to a relatively homogeneous group, and avoid the inconvenience to the operating offices of having to release JOT's for subsequent training courses at a time when they are deeply enmeshed in activities of their offices.

Language and area training will be given the JOT when the DD/I offices indicate a need for it. In the case of JOT's assigned to the Clandestine Services for on-the-job training, language and area training will be given when an overseas assignment has been agreed to and as close to the date of departure as feasible.

The Formal Training Program is composed roughly of six blocks of instruction as per the attached schedule (Attachment 1). I'd greatly appreciate your participation in the first block of the course, Intelligence Introduction, with a talk on "The History of American Intelligence" along the lines previously discussed with you by [redacted]. A copy of the Intelligence schedule is attached (Attachment 3) indicating speakers who will precede and follow you.

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The general objectives of the Formal Training Program (see Attachment 2), particularly II, 1. and 2. are important considerations during the initial experience the JOT's will have with the Agency. For the first nine months of duty with CIA, the JOT

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will perforce form his opinion about our business from the people he meets and listens to. This is why I so much want you to participate in the program. I don't think one can wave the flag too vociferously before these kids, and I certainly don't expect you to whoop it up for Old Nassau. But it will help the as yet unconvinced neophyte in making his career decision to hear why you have chosen to devote a good size chunk of your life to this business.

If you would like to discuss this further, please give me a call.

Sincerely,



25X1A

MATTHEW BAIRD  
Director of Training

Attachments

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HISTORICAL BACKGROUND OF THE  
CENTRAL INTELLIGENCE AGENCY

I. The American Intelligence system had its beginning in the midst of the Revolutionary War.

A. In the early days of the War, the Continental Army depended on prisoners, deserters and refugees *for information*.

B. The need for better information led Washington to operate his personal secret service.

C. From the early days of the Republic, the gathering of information by unpublicized means was regarded as a legitimate function for which public funds could be spent.

1. The army and navy obtained intelligence information incidental to their other duties.

2. The diplomatic service utilized unvouchered funds.

II. Intelligence activities during the Civil War were more advanced than during the Revolution, but it was still not an organized service.

A. President Lincoln, himself, hired a man to gather information while in the South. (Totten Case)

B. Intelligence was practical in nature.

1. Brig. Gen. Dodge was charged with directing a secret service in the West.

2. Denied funds by Quartermaster he confiscated and sold cotton crops to pay for his agents.

III. Following World War I, intelligence information was obtained by diplomats and attaches.

IV. Immediately after World War II broke out in Europe, the government undertook preparations for a national emergency.

A. The Office of Emergency Management was established in May 1940 to advise and assist the President.

B. In order to gain information on enemies and allies, William J. Donovan was appointed to position of Coordinator of Information in July 1941.

1. Authority to "collect and analyze all information and data and to make such information and data available to the President and to such departments and agencies as the President may determine, and to carry out, when requested by the President, such supplementary activities as may facilitate the securing of information important for national security not now available to the government."

2. He was to have access to information and data in other agencies, but he was not to interfere or impair the responsibility of the President's regular military advisers.

3. This was the forerunner of a centralized United States intelligence service.

C. OSS was established on 13 June 1942 and the Office of Coordinator of Information was abolished.

4. OSS's mission was simple: "a. Collect and analyze such strategic information as may be required by the United States Joint Chiefs of Staff; and b. Plan and operate such special service as may be directed by the United States Joint Chiefs of Staff."

2. William J. Donovan was appointed as Director.
3. OSS was allowed certain privileges in conducting its operations.
  - a. It could enter into contracts "without provisions of law."
  - b. Latitude was granted in expenditure of public funds.

V. Studies were undertaken to develop the concept of a permanent centralized intelligence service.

A. On 10 October<sup>44</sup>, Gen. Donovan presented a document to President Roosevelt entitled "The Basis for a Permanent United States Foreign Intelligence Service."

1. It contained much of the basic scheme of the present Central Intelligence Agency.

2. According to Gen. Donovan, an organization was needed "which will procure intelligence by overt and covert methods and will at the same time provide intelligence guidance, determine national intelligence objectives and correlate the intelligence material collected by all government agencies."

3. General Donovan suggested that the establishment of a United States intelligence agency be governed by ten principles:

- "1. That it should be a central overall Foreign Intelligence Service which (except for specialized intelligence pertinent to the operations of the Armed Services and certain other Government agencies) could serve objectively and impartially the needs of the diplomatic, military, economic and propaganda service of the Government.

- "2. That such a Service should not operate clandestinely within the United States.

"3. That it should have no policy function and should not be identified with any law enforcing agency either at home or abroad.

"4. That the operations of such a Service should be primarily the collection, analysis, and dissemination of intelligence on the policy or strategy level.

"5. That such a Service should be under a highly qualified director appointed by the President and be administered under Presidential direction.

"6. That, subject to the approval of the President, the policy of such a Service should be determined by the Director with the advice and assistance of a board on which the Department of State and the Armed Services should be represented.

"7. That such a Service charged with collecting intelligence affecting national interests and defense should have its own means of communication and should be responsible for all secret activities such as:

- (a) Secret intelligence.
- (b) Counterespionage.
- (c) Crypto-analysis.
- (d) Clandestine subversive operations.

"8. That such a Service be operated on both vouchered and unvouchered funds.

"9. That such a Service have a staff of specialists professionally trained in analysis of intelligence and possessing a high degree

of linguistic, regional or functional competence to evaluate incoming intelligence, to make special reports, and to provide guidance for the collecting branches of the Government.

"10. It is not necessary to create a new agency. The nucleus of such an organization already exists in the Office of Strategic Services."

B. President Roosevelt continued to be actively interested in the establishment of a centralized intelligence service until his death.

C. Gen. Donovan emphasized that intelligence control "be returned to the supervision of the President" and that the "establishment of a central authority reporting directly to the President with responsibility to frame intelligence objectives and to collect and coordinate the intelligence material required by the executive branch in planning and carrying out national policy and strategy."

1. Several new proposals were added to the ten principles including (a) overall coordination of intelligence functions in government; and (b) procurement and training of intelligence personnel.

2. Secrecy was recognized as essential to the successful operation of the agency in management and organization.

D. The Joint Chiefs accepted Donovan's plan in principle but criticized it because they feared overcentralization.

1. The Joint Chiefs recommended that existing intelligence agencies continue to operate but make their products available to a central intelligence service for synthesis.

2. Secretary of Navy Forrestal considered their paper soundly conceived and suggested that the plan for a federal intelligence service be pushed "vigorously at the White House."

E. The Lovett Committee in the War Department considered the views of many people experienced in wartime intelligence and submitted a report to the Secretary of War which was approved by the Secretary of War, Navy and State and which was sent to the White House on 7 January 1946.

1. This report contained many of Gen. Donovan's original ideas.

2. President Truman was sympathetic to the plan.

VI. President Truman by a Presidential Directive of 22 January 1946 established a federal intelligence system -- *National Intelligence Authority*  
*the Central Intelligence Group and*

- A. The basic responsibility for intelligence was put in the NIA.

- B. Coordinating, evaluation and dissemination of intelligence were given to a Director of Central Intelligence ~~Group~~.

- C. The White House concept of intelligence at that time was that CIG would be an interdepartmental group and would not be an operational entity.

1. Prior to the 22 January order OSS was abolished and Research and Analysis Section was transferred to State and the remainder to War.

2. SSU was set up in War essentially consisting of Secret Intelligence, Counterespionage and Communications.

3. SSU began to turn to direct support of the DCI.

4. CIG absorbed SSU.

- D. Enabling legislation was requested for CIG in July 1946.



1. Expenditure of CIG funds accomplished by practical arrangements with Treasury, Comptroller General and other agencies.

2. The agency lacked operating authorities.

VII. The National Defense Act of 1947 included the establishment of the Central Intelligence Agency.

- A. Congressional interest in an intelligence agency was spurred by the results of the investigation into the Pearl Harbor disaster.

- B. Unification legislation set up the NSC and under it CIA.

- C. Intelligence agency section of the unification act was considered as one of its most important points.

- D. Congress had difficulty in the determining of CIA's organizational position in the government structure.

1. General Vandenberg said he and the President were opposed to any more agencies freewheeling.

2. Senator Tydings wanted close relationship between CIA and Defense.

- a. Pearl Harbor revisited.

- b. Should not happen again.

3. Mr. Boggs suggested Director be a member of NSC.

4. Mr. Forrestal disagreed because he did not want NSC expanded but he said that Director would have great influence on NSC.

VIII. CIA enabling legislation was passed in 1949 after failure in 1947.

- A. Mr. Marcantonio provided opposition in House.

1. He charged that there was too much secrecy, danger to civil liberties and the alien and confidential funds provisions were undesirable.

2. The vote was 348-4.

1. He offered two amendments in debate, one to prevent CIA employees on home leave from infiltrating labor unions and business enterprises.

2. Passed by voice vote.

The American intelligence system had its beginning in the midst of the Revolutionary War. As the war progressed General Washington had a growing need for certain and continuing information on the British forces and their intentions. In the early days of the War, the Continental Army depended on prisoners, deserters and refugees. The need for better information led Washington to devise his own secret service, which operated mostly under his personal guidance. No formal organization emerged, but an awareness developed of the need for information about the enemy which could only be obtained through clandestine means.

From the early days of the republic, the gathering of information by unpublicized means by the War and Navy Departments was regarded as a legitimate function for which public funds could be spent. The intelligence function, however, was considered only as incidental to other duties. Even in the Civil War, intelligence was more of a personal mission with the Commanders than an organized service. President Lincoln himself directly hired a man to gather information while in the South - a man by the name of Loyd, whose administrator, after the war, tried to collect the salary for which Loyd had contracted. The case eventually went up to the Supreme Court which held that the Government was not obligated to pay because Loyd was employed in a secret service and a contract for such employment could not be divulged even in court because of the danger of embarrassment and compromise.

Intelligence activities during the Civil War were more advanced than they were during Washington's time but intelligence was still unorganized in the sense of being directed by policy emanating from headquarters. Rather, intelligence during the Civil War was practical in nature and directed by the needs of an army. The exploits of Brig. Gen. G.M. Dodge reflected this.

Dodge was charged with the duty of recruiting, organizing and directing a secret service in the West. Denied the necessary funds by the Quartermaster for paying agents, Dodge resorted to confiscating and selling cotton crops using the proceeds to pay his agents.

Intelligence activities were supported in the main by the armed services during World War I and during the period between the two World Wars. Between the Wars, most of the information received on the status of foreign governments, their armies, politics and economics was from attaches *and diplomats*.

Immediately after World War II started in Europe in September 1939, steps were undertaken to prepare the United States for a national emergency and by May 1940 an Office of Emergency Management was established to advise and assist the President. It was evident at that time that the United States had little knowledge of ~~its~~ potential enemies or allies. In order to gain information necessary <sup>for safety of the</sup> to the country with war approaching, Colonel William J. Donovan was appointed by President Roosevelt to the position of Coordinator of Information in July 1941. He had authority from President Roosevelt to: "Collect and analyze all information and data, and to make such information and data available to the President and to such departments and agencies as the President may determine, and to carry out, when requested by the President, such supplementary activities as may facilitate the securing of information important for national security not now available to the Government." The Coordinator of Information was to have access to information and data within the various departments and agencies but he was not to interfere with or impair the duties and responsibilities of the President's regular military and naval advisers. To assist him, the Coordinator could appoint committees of representatives of the various departments and agencies.

Under his broad mandate, the Coordinator of Information began to put together an organization capable of producing intelligence necessary for the successful carrying out of the war effort. <sup>12</sup> This was the forerunner of a centralized United States intelligence service.

Several months after we entered the war, on 13 June 1942, by a military order, the President abolished the Office of Coordinator of Information and established the Office of Strategic Services (OSS) which operationally came under the jurisdiction of the Joint Chiefs of Staff. OSS's mission was quite simple. It was to:

"a. Collect and analyze such strategic information as may be required by the United States Joint Chiefs of Staff; and

"b. Plan and operate such special service as may be directed by the United States Joint Chiefs of Staff."

William J. Donovan was appointed by the President as Director of Strategic Services. OSS was allowed certain privileges in conducting its operations such as entering into contracts "without regard to the provisions of law relating to the making, performance, amendment, or modification of contracts." Also it was imperative in performing certain of the wartime functions of OSS that latitude be granted in the expenditure of public funds.

In early 1944, over a year before the war's end, studies were undertaken within OSS concerning the concept of a permanent, centralized intelligence service for the United States Government. After several months of study, General Donovan drafted a document entitled "The Basis for a Permanent United States Foreign Intelligence Service," which he presented to President Roosevelt around 10 October 1944. The President asked that General Donovan continue his work on a post-war intelligence organization. Mr. Roosevelt's

interest continued and several days before his death he requested General Donovan to call a meeting of interested agencies for their suggestions "to the proposed centralized intelligence service."

The 10 October document contained much of the basic scheme which eventually was accepted for the Central Intelligence Agency. According to General Donovan, an organization was needed "which will procure intelligence both by overt and covert methods and will at the same time provide intelligence guidance, determine national intelligence objectives and correlate the intelligence material collected by all Government agencies."

General Donovan advised that the establishment of a United States intelligence agency be governed by ten principles:

"1. That it should be a central overall Foreign Intelligence Service which (except for specialized intelligence pertinent to the operations of the Armed Services and certain other Government agencies) could serve objectively and impartially the needs of the diplomatic, military, economic and propaganda service of the Government.

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"10. It is not necessary to create a new agency. The nucleus of such an organization already exists in the Office of Strategic Services."

On 18 November 1944, General Donovan submitted a memorandum to the President which emphasized that "intelligence control be returned to the supervision of the President," and that the "establishment of a central authority reporting directly to you [the President] with responsibility to frame intelligence objectives and to collect and coordinate the intelligence material required by the Executive Branch in planning and carrying out national policy and strategy."

A draft directive was also forwarded to the President which detailed the principles set out in the 10 October document and added several new proposals as functions and duties of the proposed agency including: "Coordination of the functions of all intelligence agencies of the Government . . . ; collection, either directly or through existing Government Departments and agencies, of pertinent information . . . ; procurement, training and supervision of its intelligence personnel; subversive operations abroad; and determination of policies for and coordination of facilities essential to the collection of information." The Donovan plan also recognized the element of secrecy necessary to the successful operation of an intelligence organization in that the Director was to have authority "to employ necessary personnel and make provision for necessary supplies, facilities, and services" and he "may provide for the internal organization and management . . . in such manner as he may determine."

While accepting the Donovan Plan in principle the Joint Chiefs of Staff criticized it because the organization General Donovan proposed would "overcentralize the national intelligence service" without compensating advantages and "place it at such a high level that it would control the operation of departmental intelligence agencies, without responsibility, either individually or collectively, to the heads of departments concerned."

The Joint Chiefs recommendation included an organization which would not result in a "too radical reorganization with the attendant disturbance of the present intelligence set-up." The Joint Chiefs wanted the existing intelligence agencies to continue functioning. Their products, however, were to be freely available to the Central Intelligence Agency for synthesis, and the operations of the departmental intelligence agencies were to be open to inspection by the intelligence agency in support of its planning function.



Secretary of the Navy, James Forrestal considered the Joint Chiefs of Staff paper "soundly conceived" and in a memorandum to the Secretary of War on 13 October 1945 suggested that the proposal for a federal intelligence agency should be pushed "vigorously at the White House." Shortly thereafter Assistant Secretary Lovett was placed in charge of a committee in the War Department to study the matter. After considering the views and opinions of a great many persons experienced in wartime intelligence, the Lovett Committee submitted a report to the Secretary of War which presented the case for a centralized national intelligence organization. The Lovett Committee report served as a basis for the recommendation to the President by the Secretaries of State, War and Navy for the establishment of a national intelligence organization which was submitted on 7 January 1946.

The difference between General Donovan's view that the Director of Central Intelligence should report to the President directly and the views of the military services and the Department of State that he should report to a board or through a department head were resolved by President Truman by the creation of the National Intelligence Authority on 22 January 1946, consisting of the Secretaries of State, War and Navy and the President's personal representative. The idea of a centralized coordinating function was pretty well accepted and the main debate was on the position of this function in Government structure and its responsiveness to departmental controls.

President Truman put the basic responsibility in the National Intelligence Authority and, subject to law and their direction and control, gave the coordinating, evaluating, and dissemination functions to the Director of Central Intelligence. The concept of the White House at that time was that the Central Intelligence Group would be an interdepartmental group composed

of a staff furnished by the National Intelligence Authority departments and would provide for the coordination but would not itself be an operational entity. Prior to the Truman Order, however, the position of the Director of Strategic Services had been abolished, the Research and Analysis Section of the Office of Strategic Services had been transferred to the Department of State, and the remainder of the Office of Strategic Services had been put under the jurisdiction of the Secretary of War, with the directive that it be liquidated as rapidly as possible except for such activities and assets as might be required for the peacetime intelligence function. These remnants were set up on 1 October 1945 as the Strategic Services Unit of the War Department, an almost autonomous unit reporting to the Under Secretary of the Army. The paramilitary aspects were rapidly liquidated, leaving essentially the Secret Intelligence, Counterespionage, and Communications Offices with the attendant administrative support staffs.

Upon the creation of the Central Intelligence Group, the Strategic Services Unit's contribution began to turn to the direct support of the Director of Central Intelligence, and by the spring of 1946 they were working almost as an integrated operation. This presented formidable legal and administrative problems, which led to the conclusion that the Central Intelligence Group should absorb the assets of the Strategic Services Unit and operate them directly. This was done in the fall of 1946, the funds and assets being taken over directly, the personnel being taken by transfer (allowing selective appointment from the Strategic Services Unit's rosters), and the documents being placed in the custody of the Central Intelligence Group, although for some purposes they were considered Joint Chiefs or War Department papers. Also during 1946, General Vandenberg had requested

drafts of functional and enabling legislation, which were prepared in the form of a single bill establishing the Agency, setting forth its functions, and providing for all the authorities deemed necessary for it to operate. (Meanwhile, practical arrangements had been made with the Treasury, the Comptroller General, and other agencies to allow the Central Intelligence Group to expend its own funds and otherwise act as a separate agency.) This draft legislation was brought up for top-level study in the Executive Branch of the Government at about the same time the unification of the military services was being considered. As the National Security Act took form, that portion of the draft legislation establishing the Agency and setting forth its function was incorporated into the proposed National Security Act inasmuch as it was deemed desirable to have the Director and the Agency directly responsible to the National Security Council, of which the President was to be ex-officio Chairman. However, many of the operating authorities which CIG needed were not considered on the ground that they were too controversial.

While there were many at various levels who objected strenuously still to the central intelligence idea and to a separate, independent agency to perform the function, every review at top levels confirmed the earlier conclusions in the Executive Branch that the Director of Central Intelligence should not be subordinate to any agency or board lower than the Secretaries. Aside from the debate on legislation, a separate struggle was in process in the field of intelligence proper based on the question of whether the Director had any supervision or authority over the members of the Advisory Board and the agencies they represented, or whether he was one among equals who would proceed by Board decision.

There is little doubt that the Congress intended to make the Director of Central Intelligence solely responsible in the field of foreign intelligence relating to the national security. The Director, however, cannot exercise any command authority over the departmental intelligence components, yet as head of the Agency he has a statutory duty to advise the National Security Council in matters concerning such intelligence activities of the Government departments and agencies as related to the national security and to make recommendations to the National Security Council for the coordination of such intelligence activities. The Director must, therefore, of necessity consider the scope, effectiveness, completeness, or duplication of the departmental contributions to the over-all intelligence relating to the national security.

Congressional interest in legislation to establish a Central Intelligence Agency was spurred by the results of the postwar investigations by Committees of Congress into the Pearl Harbor disaster particularly the House Committee on Military Affairs report on intelligence which recommended Congressional authorization of the National Intelligence Authority ~~direct~~ <sup>and</sup> Congressional appropriations for CIG.

In the Senate and House hearings on the National Security Act bill the need for an effective intelligence agency was stressed over and over again. The intelligence agency section of the unification bill was considered as one of the most important parts of the bill and according to one of the members of the House Committee <sup>when considering the bill</sup> the central intelligence section was given more study by the sub-committee and by the full committee than any other section. He also admitted it was the most difficult section to write. One of the greatest difficulties encountered was placing the agency into the

government structure. General Vandenberg stated that both the President and he, as Director of CIG, were opposed to any more agencies "free-wheeling" in the government and wanted the place of CIA specifically determined. In explaining the intelligence sections of the legislation before the Senate Armed Services Committee, Admiral Sherman, a member of the President's drafting committee, pointed out that the primary control of the Central Intelligence Agency was "through the National Security Council, which, of course, is responsible to the President." Senator Tydings in questioning Admiral Sherman on this occasion wanted it made very clear that there was a close relationship between the Central Intelligence Agency on one hand and the three Defense Agencies and the Joint Chiefs of Staff on the other. He believed that without a close tie-in "we may have another Pearl Harbor controversy with the question arising, 'Who got the information?' and the reply, 'It was not transmitted.' That is one thing that should not happen again."

The vagueness of CIA's actual place as set out in the bill was recognized by some members of Congress. Congressman Boggs discussed this problem with Secretary of the Navy, Forrestal at hearings of the House Committee on Expenditures in the Executive Department. Mr. Boggs suggested that the Director of Central Intelligence should be a member of the National Security Council because the knowledge and information which he had would contribute most if he were placed on an equal basis with other members of the Council. Secretary Forrestal's reply indicated that he fully supported the intelligence function particularly as to its importance to the NSC. Possibly for political reasons he did not want to see the NSC expanded, but he said that "the practical workings of [the NSC] would require [the Directors] presence

most of the time." A few minutes later he said: "This thing will work, and I have said from the beginning it would only work, if the components in it want it to work."

President Truman signed the National Security Act on 26 July 1947 and the Central Intelligence Agency was then a fact. The machinery to operate the new agency was still in the offing, however. Early in 1948 a move was begun to enact further CIA legislation; bills based on drafts submitted by CIA were introduced in the House and Senate. Committee hearings were held ~~and certain changes were made~~. The bill passed the House but was not acted upon by the Senate.

A new draft substantially the same as the one submitted previously was sent to Congress on 11 February 1949. Mr. Marcantonio provided the major opposition to the bill in debate basing his argument on such issues as the secrecy surrounding the bill which deprived Congressmen of a full explanation of the bill, the danger to civil liberties, the inappropriateness of confidential funds and the undesirability of the alien provisions. The bill passed 348-4.

Senator Langer opposed the CIA bill in debate in the Senate denouncing the secrecy surrounding the Act and the alien provisions in it. He proposed two amendments which were accepted - one specifying that CIA employees would not be available for employment except by CIA when returning to the U.S. on home leave. This was designed, he said, to prevent infiltration by CIA employees into labor unions and <sup>business</sup> ~~other~~ enterprises. Senator Johnson was concerned that CIA would have "sweeping powers which are being vested in the military through this piece of legislation." The bill passed by voice vote and after adoption by both Houses of a conference report the Central Intelligence Act was signed by President Truman on 20 June 1949. For the first time in its history the United States had a recognized independent centralized intelligence agency.

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4. It was interesting to me to note the importance attached to the responsibilities and authorities of the Small Business Administration in the letting of contracts, and although it was well recognized that the SBA representatives acted on the basis of statutory authority, nevertheless the general sentiment of the class was that contracting with small businesses had pitfalls both for the Government and for the contractors. It was also interesting to note the emphasis placed in the course upon the analysis of financial information (balance sheets, etc.) to identify potential problem areas in the negotiation or administration of a contract.

5. The instructors, who were employees of Harbridge House, were experienced and competent in their field and they stimulated the class to spirited discussion of the problems. In addition to the cases in textbook, there was one lecture daily by a representative from OMM on some aspect of contract administration. Usually the lecturers themselves had worthwhile information to impart but their ability as instructors was generally uninspiring. An exception was [redacted]

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[redacted] Procurement Division, OMM, and  
[redacted] Procurement Division, OMM.

6. In summary, the two weeks course was of considerable value to me and I feel sure that other Agency personnel who have an opportunity to attend this course will find that their knowledge of procurement activities is increased and their horizons extended to a significant degree.

STATINTL

[redacted]  
Assistant General Counsel

Distribution:

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ROUTING AND RECORD SHEET

*Page 7-3*

SUBJECT: (Optional)

FROM:

Director of Training  
11, ☐

NO.

DATE

TO: (Officer designation, room number, and building)

DATE

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OFFICER'S  
INITIALS

COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)

1. General Counsel  
221 East Bldg.

*ME*

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